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May 5, 2021

May 4, 2021

Hon. Jesse M. Furman Southern District of New York 40 Centre Street, Room 2202 New York, NY 10007 Application GRANTED on a temporary basis. The Court will evaluate whether to whether to maintain the redactions on a permanent basis when deciding the underlying motion. The Clerk of Court is directed to terminate ECF No. 16. SO ORDERED.

Re: Richard Alonzo v. William Grant & Sons, Inc.

Case Number: 1:20-cv-10937-JMF

Your Honor:

Pursuant to the Court's Electronic Case Filing Rules & Instructions § 6 and Your Honor's Individual Practices for filing redacted materials, Defendant, William Grant & Sons, Inc. ("Defendant"), respectfully seeks leave to file under seal certain materials in connection with its Motion to Dismiss (the "Confidential Materials"), and to redact from its public filings the Confidential Materials and references thereto. Defendant's papers are being filed simultaneously.

The Confidential Materials consist of non-public and highly-confidential financial records pertaining to the number of products sold by Defendant to its wholesale distributors (e.g., depletion numbers). In addition, Defendant seeks to seal highly-confidential and non-public information related to Defendant's marketing strategy and target consumers for a particular product. For these reasons, we respectfully ask that the Court grant Defendant's request for leave to file the Confidential Materials under seal and to redact the corresponding references in its memorandum of law.

Very Truly Yours,

/s/Edward T. Colbert

cc: Counsel of record